To Basingstoke and Deane Planning Department:

22/00174/OUT Woodside View Planning Application

Please accept this letter as a formal **OBJECTION** comment from Ecchinswell, Sydmonton & Bishops Green Parish Council in relation to the above Outline Planning Application. I would be grateful if you could confirm receipt.

Reasons for our objection:

The application site is situated beyond any settlement boundary and is defined as being within open countryside. In such areas market housing is resisted in-line with Local Plan Policy SS6. This application does not fall under any of the permitted reasons for building in open countryside. A development of 50 homes is not small scale in the context of our rural parish and has not been designed to meet a locally agreed need. The local need, using BDBC housing waiting list statistics, the results from the 2019 BDBC housing needs survey, and our own Neighbourhood Plan consultation is seen at fewer than 20 homes.

The application site was submitted for addition to the SHELAA under the Call for Sites process in December 2020 (EC004). The Council's assessment of the site concluded that the development of the site would not be in line with the borough's current planning framework.

The current adopted Local Plan and Council's Settlement Study 2020 state that the Bishops Green area is unsuitable to sustain any new housing development. Bishops Green is currently classed as a 'Category 5 settlement – Small Village'. Settlements of this size are only suitable to 'potentially accommodate some limited growth', mainly to meet local needs and maintain the vitality of the village. Within the emerging Local Plan Update, the village is proposed to accommodate 15 new homes, as a Category 4 settlement in the new tiering system.

A Neighbourhood Plan is currently in development for the Ecchinswell, Sydmonton & Bishops Green Parish, which reflects the emerging BDBC Local Plan Update and local resident consultations. Housing policies are being developed to accommodate a small number of new homes to meet locally agreed need in small sites across the area. A call for sites is currently underway. Approval of this application would undermine the entire Neighbourhood Plan and local community involvement, as well as conflicting with the emerging BDBC Local Plan Update.

There is no Affordable Housing Statement within the application documents. According to Basingstoke & Deane Housing Supplementary Policy SPD policy para 2.70 this is required. Affordable housing is only mentioned in general terms in the application.

The Council's lack of five-year housing land supply allows the applicant to propose the 'tilted balance' argument in favour of sustainable development, as set out within the NPPF (Para 11). Three over-arching objectives for achieving sustainable development are identified (in NPPF Para 8) as:

- an economic objective,
- a social objective and
- an environmental objective.

With respect to the environment perspective, the NPPF sets out (NPPF Para 175) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. However, within the Landscape and Visual Impact Assessment submitted in this proposal, the assessment recognises that the proposed development would increase the urbanising influences on the landscape. It states that 'the impact of the proposed development would be an Adverse Effect' (Para 5.13.). Basingstoke and Deane Landscape policy EM1 states that developments will be permitted only when it can be demonstrated that the proposal respects, enhances and is not detrimental to the character of the landscape. Thus, the environmental objective of this proposed development does not meet the NPPF sustainable guidance, nor the EM1 policy requirement.

With respect to a sustainable economic benefit from the proposed development, we dispute the applicant's suggestion that there is a significant local need for a workforce requiring 50 new homes. To be sustainable, employment should be within walking distance, or a safe cycling journey preferably not by the traffic laden A339, which limits opportunities to Greenham Business Park. Presently there appear to be few job opportunities at this site. The workforce created by these proposed homes, in the majority, would inevitably have to undertake car journeys to further afield opportunities in Newbury, Thatcham, Kingsclere or Basingstoke. The rural location of the proposed site is completely unsuited to achieve a sustainable economic objective.

With respect to the social objective, we would dispute the idea that a 22% increase in the size of the village from 230 to 280 homes 'would enhance the vitality and viability of the local community facilities'. A development of this size would significantly change the rural feel of this village and put further strain on services. Presently, there are no schools or doctors within Bishops Green, and the village's amenities are limited to a very small convenience store and village hall.

Most key facilities are some distance away and not served by public transport. This will result in the development being reliant on private car use.

The nearest facilities are as follows:

- Primary School more than 3.5km
- Secondary School more than 4km
- Medium/Large Supermarket more than 4km
- Doctors more than 5km (appointments sometimes only available in Oakley or Overton)
- Leisure Centre/Gym more than 5km

The lack of facilities in the immediate area and the limited bus service will require a significant number of regular car journeys. The suggestion in the application of 26 and 21 two-way movements in the morning and evening road network peak hours is not realistic.

The application bases this figure on TRICS data, and a census carried out during a COVID 'work from home' period. The entire Transport Assessment is desk based and bears no reality to either the existing or potential situation on Ecchinswell Road in Bishops Green.

The Parish Council commissioned our own traffic census in October 2021, sited at the point along Ecchinswell Road near the proposed main access to the site. Our results suggest a far greater figure for two-way movements from a development of 50 homes.

The Parish Council has a Traffic & Speeding Working Party which has been gathering information since 2020. Our data for the Ecchinswell Road near the site shows:

- Significant speeding along this stretch of road
- Three serious accidents in last three years
- High traffic numbers for the size of road
- Cycling not safe on Ecchinswell Road or along A339

The proposed development is therefore considered to result in unacceptable levels of transport movement, congestion and pollution. Hence the application conflicts with Local Plan Policy CN9.

For all these reasons the site should not be considered as a sustainable location. The development would also be heavily reliant on the facilities and infrastructure of West Berkshire. There appears to have been no consultation with West Berkshire during the preparation of this application.

The isolated location of the site and reliance on cars would have a negative impact on climate change and the BDBC declaration of a climate emergency. The application put forward does not commit to measures for all homes which would contribute to carbon neutral housing. EV charging points are not guaranteed for every house nor is the use of heat pump technology.

There are a number of sensitive and important ecological designations around the application site. The site is bounded to the west by a SINC with ancient woodland. Across the Enborne to the north of the site, falling within West Berkshire's administrative area, is a Site of Special Scientific Interest (SSSI) - Greenham Common. The applicant has identified the site as a habitat for the hazel dormouse which is a protected species. The level of the protection measures proposed for this species may well be inadequate. This conflicts with policy EM4 of the Local Plan and national policy.

The site is close to the River Enborne and there is local concern about increased run-off and associated flooding and pollution. The river already floods in this area, regularly covering the road by the bridge on Ecchinswell Road. The river condition was designated as 'moderate' and in need of remediation in a 2017 study by the Wild Trout Trust.

At the point of sending this letter there has been a significant number of objections from local residents. These focus on the inappropriate scale of development and the knock-on effects for traffic and services. Consultees have also raised issues around the proposal.

In summary Ecchinswell, Sydmonton & Bishops Green Parish Council **OBJECTS** to this planning application based on the reasons outlined within this response and with the main points of objection summarised below:

- Unacceptable in principle, contrary to Local Plan Policies SS1 and SS6
- Contrary to the current Local Development Plan and emerging update
- Unsustainable; inappropriate location for a residential development of 50 homes with measures to limit climate change not sufficient
- Undermines development of the Neighbourhood Plan and community led neighbourhood planning
- The scale of development, at odds with the character of the area and size of Bishops Green
- Impact on transport network, congestion and highway safety
- Impact on ecological sites, habitats and protected species

As this is a large-scale development in the context of our parish, we trust this will be taken to Committee and we wish to be notified about any Committee date. We wish to speak at Committee and provide further representations at any subsequent stage.

Yours sincerely,

Sarah Jones

Clerk to Ecchinswell, Sydmonton & Bishops Green Parish Council